Mr. W. Hord Tipton
Chief Information Officer
Department of Interior
1849 C Street, NW
Washington, DC 20240

Re: Section 508 Survey
Analysis of Agency Submission

Dear Mr. Tipton:

Thank you for your agency participation in the survey of Section 508 compliance conducted by the U.S. Department of Justice and the General Services Administration (GSA). GSA has undertaken an analysis of the survey responses in an effort to provide feedback to your agency. This letter conveys a report of your agency's responses from this survey. The biennial Section 508 survey is an important element in helping the Federal government fully implement Section 508.

Your agency's participation was coordinated by your *Designated Agency Official (DAO)*:

Nancy Trent
nancy_trent@os.doi.gov
(202) 208-6051

If your agency is large or complex, the DAO may have also designated component-level personnel who were responsible for specific subsections of this survey for individual components within your agency. **Each component and component-level DAO is listed in Appendix A.**

The survey focused on four areas of Section 508 compliance. These four sections are:

- **Procurement.** This section of the survey focused on procurement practices and procedures within your agency. Specifically, this portion analyzed training, contract requirements, documentation of decisions, exceptions, commercial non-availability, and market research. This section also asked agencies to examine a sampling of completed procurements to ensure that internal Section 508 procedures were followed. Despite a lower than average number of hours devoted to training procurement personnel, the agency

reported good overall performance in meeting the requirements of Section 508. Specifically, the agency components reported providing more detailed requirements in their solicitations and using multiple testing methods to assess compliance. Also the agency components reported being successful in meeting the Section 508 requirements in the actual procurements that were evaluated.

- **General Processes Implementing Section 508.** This section addressed agency processes for developing software and other electronic and information technology and for meeting other Rehabilitation Act concerns (i.e., Section 504) closely related to Section 508 compliance. Overall, the agency reported results that were relatively consistent with other agencies of comparable size. The agency gave average results with respect to establishing and enforcing accessibility guidelines for the development of software, other E&IT, and multimedia productions. More specifically, while guidelines were in place, many components did not report that these guidelines were enforced uniformly. In addition, your agency components reported lower numbers of closed-captioning for their multimedia productions than other comparable agencies, and average responses regarding most aspects of TTY availability, access, and compatibility.

- **Administrative Complaints and Civil Actions.** This section examined policies and procedures for handling Section 508 complaints and requested statistics on the number of complaints and judicial actions involving your agency. Overall, agency components did not report the existence of a complaint process specific for Section 508. Instead they reported using their pre-existing Section 504 process. Nevertheless, components reported the inclusion of ADR principles in these processes, and higher-than-average numbers with regard to the dissemination of information about these complaint processes. No Section 508-related complaints or judicial actions were reported.

- **Website Compliance.** This section first inquired about agency general policies and practices for developing and maintaining web pages within your agency. Then, agencies were asked to conduct a thorough examination of their top twenty web pages within each agency component to determine whether your sites adhere to established agency policies and government-wide guidance. In general, your agency components reported an above-average level of success in implementing and enforcing web design policies that incorporates accessibility, and an average level of success in making web pages accessible. In many instances, components reporting avoiding accessibility problems by using more-accessible technologies and refraining from using less-accessible technologies. However, components reported difficulty with respect to specific accessibility issues including server-side

image maps, style sheet interference, PDF file accessibility, equivalent test for JavaScript and Flash presentations, and navigation link skipping.

The attached report provides a full summary of your agency components' responses to all questions covered in the survey. In addition, your agency components' data are compared with the overall performance of Federal government agencies of a comparable size. All of your agency components' (if any) responses were combined in order to provide an overall snapshot of your agency's progress in implementing Section 508. Only your agency has access to the summary data; this agency-specific information is not revealed in reports for other agencies. **All data, broken down by component, was provided in an electronic format and e-mailed to your agency Section 508 Coordinator.**

Agencies are encouraged to use this detailed information to identify areas requiring further attention or special recognition in achieving compliance with Section 508. If you have any questions about this process or the report, please contact Terry Weaver of my staff. Ms. Weaver can be reached at 202-501-1136 or via email terry.weaver@gsa.gov.

Sincerely,

Mary Mitchell
Deputy Associate Administration
Office of Technology Strategy

Enclosure

Report on Section 508 Survey

Analysis of Agency Submission

For

Department of Interior

SECTION I - PROCUREMENT

This section of the survey focused on procurement practices and procedures within your agency. There were six specific areas analyzed:

- General procurement information
- Training of agency personnel
- Contract requirements
- Decision documentation
- Use of exceptions and determinations of commercial non-availability
- Market research

In addition, agencies were also asked to examine several completed procurements to ensure that Section 508 procedures were followed.

The following report summarizes your agency's procurement performance in each of these areas and identifies areas where your agency follows procurement practices consistent with other comparable Federal agencies and where your agency stands out from other comparably sized agencies. This information should help guide you in making future procurement decisions regarding Section 508 compliance.

In general, your agency reported data that was consistent with the reported performance of other comparably sized Federal agencies. Several highlights appeared in the information provided by the agency components:

- Agency components reported zero hours of annual training for all procurement officials.

- Regarding methods of Section 508 inclusion in solicitations, agency components reported relying on specific applicable Federal Accessibility Standard requirements in each Statement of Work or Statement of Objectives, and standard component-level language in each SOW or SOO.

- Your components reported using in-house testing, third-party testing, and review of submitted materials as their primary Section 508 testing methods, an approach shared by many other agencies.

- Agency components did not report the use of formal decision documentation in their procurement files regarding Section 508 applicability or exceptions, while 36.4% of all other agencies of a comparable size did.

- Where procurements were exempt from coverage under Section 508, your agency reported a high reliance on the "product located in space that is infrequently accessed" exception.

- When agency components evaluated prior procurement actions, they reported average success in meeting their Section 508 requirements. Two procurements were exempt due to undue burden.

Your agency reported a total of nine individual components participating in this survey. However, one component did not complete Section I because it was not responsible for its own electronic and information technology (E&IT) procurements.

A.   General Procurement Information

Question 1 asked each agency component about the number of procurement awards for E&IT made in FY2003. Your agency components reported 652 awards between $25,000 and $100,000, 350 awards between $100,000 and $5 million, and two awards greater than $5 million. One components responded "N/A" (because this information was classified).

Question 2 asked each agency component about the number of procurement protests filed against your agency based on non-compliance of Section 508 of the Rehabilitation Act. The entire Federal Government received two complaints. The components within your agency reported that no complaints were filed.

In **Question 3**, your agency components reported that no complaints were sustained as result of Section 508 issues. No protests (0% of all sustained protests) resulted in recompetition. Agencies of comparable size reported an average of zero sustained protests, with 0% resulting in reawarding or recompetition. The Federal Government as a whole had 0% of their sustained protests reawarded or submitted for recompetition.

Question 4 asked how these complaints in FY2003 could have been avoided, and listed several preemptive actions. Your components were allowed to choose from as many actions as listed. Because your agency reported that no complaints were filed, no information was provided in response to this question.

B.   Training

Questions 5 through 8 asked for information on annual Section 508 training for various members in your procurement workforce. More specifically, your components were requested to provide the number of hours of annual training required. Your agency components' responses are summarized below:

Procurement Personnel	Average Hours of Annual Training Per Person	Average Hours of Annual Training Per Person in All Agencies in Your Size Category
Question 5: Acquisition workforce (contracting officers, contract specialists, etc.)	0	1.4
Question 6: Requiring officials (program managers, contracting officer's technical representatives, etc.)	0	1.14
Question 7: Initial instruction for new purchase cardholders	0	0.62
Question 8: Refresher instruction for existing purchase cardholders	0	0.49

C.   Contract Requirements

Question 9 asked how your components incorporated Section 508 requirements in their solicitations. This question permitted your components to identify any number (or none) of six possible choices. Your agency components' responses are summarized below:

Method of Section 508 Incorporation in Solicitation	Number of Components Selecting this Option	Percentage of Total Responses from All Components	Percentage of Total Responses For All Agencies in Your Size Category
(a) Provided specific applicable Federal Accessibility Standard requirements in each Statement of Work (SOW) or Statement of Objectives (SOO)	4	40.00%	23.0%
(b) Component's standard language incorporated in SOW or SOO	2	20.00%	13.5%
(c) Component's standard language incorporated as a clause	0	0.00%	24.5%
(d) Used the Voluntary Product Accessibility Template (VPAT)	1	10.00%	8.0%
(e) Requested certification of compliance with the Standard	1	10.00%	16.0%
(f) Other	2	20.00%	15.0%

Question 10 asked for the specific terms and conditions of Section 508 that were covered in your solicitations (whether they were RFQs or RFPs). This question also permitted your components to identify any number (or none) of six possible choices. Your agency components' responses are summarized below:

Specific Terms and Conditions	Number of Components Selecting this Option	Percentage of Total Responses from All Components	Percentage of Total Responses For All Agencies in Your Size Category
(a) Basic Section 508 conformance/compliance by the contractor	6	54.55%	56.7%
(b) IDIQ procurement actions (requirements for identification of individual Section 508 conforming products, discretion to add conforming products, and/or searchable listings of conforming products)	3	27.27%	18.0%
(c) Warranty provisions	0	0.00%	3.9%
(d) Technology refreshment provisions	1	9.09%	7.9%
(e) Special Acceptance or Inspection provisions	0	0.00%	2.8%
(f) Other	1	9.09%	10.7%

In **Question 11**, your agency components were asked how they identified contract requirements for Section 508 testing and acceptance of deliverables. This question also permitted your components to identify any number (or none) of five possible choices. Your agency components' responses are summarized below:

Testing Method	Number of Components Selecting this Option	Percentage of Total Responses from All Components	Percentage of Total Responses For All Agencies in Your Size Category
(a) Testing done in-house	5	33.33%	26.4%
(b) Testing done by a third party	3	20.00%	13.2%
(c) Review of material submitted	3	20.00%	34.1%
(d) No evaluation	3	20.00%	20.9%
(e) Other	1	6.67%	5.5%

D.   Decision Documentation

Question 12 asked for your agency components' decision documentation methodologies used by requiring officials when determining Section 508 applicability or exceptions on a particular procurement. This question also permitted your components to identify any number (or none) of four possible choices. Your agency components' responses are summarized below:

Decision Documentation Methodology	Number of Components Selecting this Option	Percentage of Total Responses from All Components	Percentage of Total Responses For All Agencies in Your Size Category
(a) Requiring officials communicated the information to the contract specialist by formal written notice (standard form required by agency or component).	0	0.00%	36.4%
(b) Requiring officials communicated the information to the contract specialist by informal written notice (no form required by agency or component).	4	57.14%	23.7%
(c) Requiring officials communicated the information to the specialist orally.	1	14.29%	11.0%
(d) Other	2	28.57%	28.8%

Question 13 inquired about the existence of an automated system for tracking and documenting Section 508 decisions (non-availability determination, undue burden exceptions, etc). Your agency components' responses are summarized below:

Automated Section 508 Decision Tracking System	Number of Components Selecting this Option	Percentage of Total Components Selecting this Option	Percentage of Components Selecting this Option For All Agencies in Your Size Category
(a) Yes. An automated tracking system was in place.	0	0.00%	1.7%

(b) No. An automated system was not set up.	7	100.00%	98.3%

E.   Exceptions and Determinations of Commercial Non-Availability

Question 14 asked how many and what types of Section 508 exceptions were claimed for all E&IT procurement actions during FY2003. Three components were unable to respond because they did not track this data. Your agency components' responses are summarized below:

Exemption	Number of Contracts	Percentage of Total Contracts	Percentage of Contracts in All Agencies in Your Size Category
(a) No exception used, product met Section 508 requirements	1	4.76%	88.0%
(b) National Security	6	28.57%	3.7%
(c) Product was to be acquired by a contractor incidental to a contract	3	14.29%	0.2%
(d) Product was to be located in space frequented only by service personnel for maintenance, repair, or occasional monitoring	2	9.52%	5.6%
(e) Undue Burden	5	23.81%	0.4%
(f) Determination of commercially non-availability	4	19.05%	2.2%

In **Question 15**, *if an agency component marked (g) for Question 14*, it was asked to rank, based on use, a list of six common Section 508 exceptions for FY2003 procurements. Your agency components' rankings (with 1 as the most used and 6 as the least used) are summarized below:

Exemption	Average Ranking	Average Ranking of All Agencies in Your Size Category
(a) No exception used, product met Section 508 requirements	1	1
(b) National Security	6	6
(c) Product was to be acquired by a contractor incidental to a contract	3	2
(d) Product was to be located in space frequented only by service personnel for maintenance, repair, or occasional monitoring	2	4
(e) Undue Burden	5	5
(f) Determination of commercially non-availability	4	3

Question 16 asked for the minimal level of administrative approval of an Undue Burden exception related to an E&IT procurement. Your agency components' responses are summarized below:

Minimal Level of Approval	Number of	Percentage of Total	Percentage of Components

	Components Selecting this Option	Components Selecting this Option	Selecting this Option For All Agencies in Your Size Category
(a) An approving official or board at the Department or Agency level	0	0.00%	22.1%
(b) An approving official or board at each component of the Department or Agency	1	20.00%	35.4%
(c) An approving official or board below the component level	0	0.00%	5.3%
(d) Requiring or procurement official without additional approval	4	80.00%	23.9%
(e) Other	0	0.00%	13.3%

Question 17 is similar to Question 16 except that it asks the minimal level of administrative approval for all exceptions *other than Undue Burden*. Your agency components' responses are summarized below:

Minimal Level of Approval	Number of Components Selecting this Option	Percentage of Total Components Selecting this Option	Percentage of Components Selecting this Option For All Agencies in Your Size Category
(a) An approving official or board at the Department or Agency level	0	0.00%	3.5%
(b) An approving official or board at each component of the Department or Agency	0	0.00%	30.1%
(c) An approving official or board below the component level	0	0.00%	10.6%
(d) Requiring or procurement official without additional approval	6	100.00%	47.8%
(e) Other	0	0.00%	8.0%

F.   Market Research

Question 18 asked your agency components to rank a given list of six common sources of market research regarding E&IT procurements in FY2003. Your agency components' ranking (with 1 as the most used and 5 as the least used) are summarized below:

Market Research Methodology	Average Ranking	Average Ranking of All Agencies in Your Size Category
(a) GSA Buy Accessible	3	3
(b) Internet research	1	1

(c) Internal database of products/Voluntary Product Accessibility Template (VPAT)	4	4
(d) Requests to vendors	2	2
(e) Other agencies	5	5

Question 19 is an open-ended question that asked your agency components to offer any additional information regarding procurements, such as lessons learned or best practices that your components had adopted. One of your agency components commented that, in the case of an IDIQ contract, they learned it was easier to deal with Section 508 compliance as part of the basic award process rather than addressing this issue on an order-by-order basis. Another component said that online training for Section 508 would be particularly advantageous.

G.   Specific Procurement Actions

In this section, your components were asked to identify three representative awards that were awarded during FY2003 within each of the three specific dollar categories (as illustrated in Question 1) and to answer a set of questions regarding each procurement. Your components were recommended to choose the three most expensive E&IT procurements in each dollar category, as long as they did not contain classified information or was not readily obtainable.

Question 20: E&IT Purchases between $25,000 and $100,000

Question 20 asked your agency's components to examine three representative E&IT purchases between $25,000 and $100,000. Components were asked to examine whether an exception was claimed for this product. Your agency components' responses are summarized below:

Exception Claimed	Number of Purchases	Percentage of Total Purchases	Percentage of Total Purchases in All Agencies in Your Size Category
(a1) An exception was not claimed for the product.	6	60.00%	87.3%
(a2) National Security.	0	0.00%	0.4%
(a3) Product was to be acquired by a contractor incidental to a contract.	0	0.00%	0.0%
(a4) Product was to be located in space frequented only by service personnel for maintenance, repair, or occasional monitoring.	3	30.00%	10.8%
(a5i) Undue Burden. Documentation required by FAR 39.204(e)(2) was attached explaining the undue burden.	1	10.00%	0.8%
(a5ii) Undue Burden. Required documentation was not attached.	0	0.00%	0.8%

In those cases where your components did not claim an exception, the component was asked to assess the availability of accessible products. Components were asked to describe their Section 508 assessment experience. Your agency components' responses are summarized below:

Experience Finding Section 508 Compliant Products	Number of Purchases	Percentage of Total Purchases	Percentage of Total Purchases in All Agencies

			in Your Size Category
(b1) There was more than one product fully meeting the applicable Section 508 standards and the component selected one of the products fully meeting the standards.	4	40.00%	58.4%
(b2) There was only one product fully meeting the applicable Section 508 standards and the component selected that product.	0	0.00%	8.6%
(b3i) No product met all of the Section 508 standards. We chose the product that best met the applicable Section 508 standards and included all FAR 39.203(c)(2) documentation.	0	0.00%	1.6%
(b3ii) No product met all the Section 508 standards. We chose the product that best met the applicable Section 508 standards but did not include the required documentation.	0	0.00%	2.7%
(b4i) No product met all of the Section 508 standards. We did not choose the product that best met the applicable Section 508 standards, but we included all FAR 39.203(c)(2) documentation.	0	0.00%	0.0%
(b4ii) No product met all of the Section 508 standards. We did not choose the product that best met the applicable Section 508 standards, and we did not include the required documentation.	0	0.00%	1.9%
(b5i) No product met any of the Section 508 standards. All FAR 39.203(c)(2) documentation was included.	0	0.00%	0.8%
(b5ii) No product met any of the Section 508 standards. All FAR 39.203(c)(2) documentation was not included.	0	0.00%	1.6%
(b6) Other.	6	60.00%	24.5%

Question 20 then asked how the contract specified test and acceptance of deliverables in light of the applicable Section 508 standards. This question also permitted your components to identify any number (or none) of six possible choices. Your agency components' responses are summarized below:

Product Testing	**Number of Purchases**	**Percentage of Total Responses from All Components**	**Percentage of Total Responses For All Agencies in Your Size Category**
(c1) Testing done in-house	1	10.00%	21.7%
(c2) Testing done by a third party	0	0.00%	9.4%
(c3) Review of material submitted	0	0.00%	21.7%
(c4) No evaluation	5	50.00%	31.0%
(c5) N/A. An exception was used.	2	20.00%	4.3%
(c6) Other	2	20.00%	11.9%

Question 21: E&IT Purchases between $100,000 and $5 million

Question 21 asked your agency's components to examine three representative E&IT purchases between $100,000 and $5 million. First, components were asked to examine whether an exception was claimed for this product. Your agency components' responses are summarized below:

Exception Claimed	Number of Purchases	Percentage of Total Purchases	Percentage of Total Purchases in All Agencies in Your Size Category
(a1) An exception was not claimed for the product.	4	57.14%	87.7%
(a2) National Security.	1	14.29%	1.9%
(a3) Product was to be acquired by a contractor incidental to a contract.	0	0.00%	0.9%
(a4) Product was to be located in space frequented only by service personnel for maintenance, repair, or occasional monitoring.	1	14.29%	8.5%
(a5i) Undue Burden. Documentation required by FAR 39.204(e)(2) was attached explaining the undue burden.	1	14.29%	0.9%
(a5ii) Undue Burden. Required documentation was not attached.	0	0.00%	0.0%

In those cases where your components did not claim an exception, the component was asked to assess the availability of accessible products. Components were asked to describe their Section 508 assessment experience. Your agency components' responses are summarized below:

Experience Finding Section 508 Compliant Products	Number of Purchases	Percentage of Total Purchases	Percentage of Total Purchases in All Agencies in Your Size Category
(b1) There was more than one product fully meeting the applicable Section 508 standards and the component selected one of the products fully meeting the standards.	4	66.67%	55.1%
(b2) There was only one product fully meeting the applicable Section 508 standards and the component selected that product.	0	0.00%	8.4%
(b3i) No product met all of the Section 508 standards. We chose the product that best met the applicable Section 508 standards and included all FAR 39.203(c)(2) documentation.	0	0.00%	5.1%
(b3ii) No product met all the Section 508 standards. We chose the product that best met the applicable Section 508 standards but did not include the required documentation.	0	0.00%	3.4%
(b4i) No product met all of the Section 508 standards. We did not choose the product that best met the applicable Section 508 standards, but we included all FAR 39.203(c)(2) documentation.	0	0.00%	0.6%
(b4ii) No product met all of the Section 508 standards. We did not choose the product that best met the applicable Section 508 standards, and we did not include the required documentation.	0	0.00%	0.0%
(b5i) No product met any of the Section 508 standards. All FAR 39.203(c)(2) documentation was included.	0	0.00%	0.0%

	Number of Purchases	Percentage	Percentage
(b5ii) No product met any of the Section 508 standards. All FAR 39.203(c)(2) documentation was not included.	0	0.00%	2.2%
(b6) Other.	2	33.33%	25.3%

Question 21 then asked how the contract specified test and acceptance of deliverables in light of the applicable Section 508 standards. This question also permitted your components to identify any number (or none) of six possible choices. Your agency components' responses are summarized below:

Product Testing	Number of Purchases	Percentage of Total Responses from All Components	Percentage of Total Responses For All Agencies in Your Size Category
(c1) Testing done in-house	2	25.00%	24.3%
(c2) Testing done by a third party	1	12.50%	9.8%
(c3) Review of material submitted	3	37.50%	22.6%
(c4) No evaluation	0	0.00%	26.0%
(c5) N/A. An exception was used.	2	25.00%	6.4%
(c6) Other	0	0.00%	11.1%

Question 22: E&IT Purchases greater than $5 million

Question 22 asked your agency's components to examine three representative E&IT purchases greater than $5 million. First, components were asked to examine whether an exception was claimed for this product. Your agency components' responses are summarized below:

Exception Claimed	Number of Purchases	Percentage of Total Purchases	Percentage of Total Purchases in All Agencies in Your Size Category
(a1) An exception was not claimed for the product.	4	100.00%	90.6%
(a2) National Security.	0	0.00%	1.0%
(a3) Product was to be acquired by a contractor incidental to a contract.	0	0.00%	2.1%
(a4) Product was to be located in space frequented only by service personnel for maintenance, repair, or occasional monitoring.	0	0.00%	6.3%
(a5i) Undue Burden. Documentation required by FAR 39.204(e)(2) was attached explaining the undue burden.	0	0.00%	0.0%
(a5ii) Undue Burden. Required documentation was not attached.	0	0.00%	0.0%

In those cases where your components did not claim an exception, the component was asked to assess the availability of accessible products. Components were asked to describe their Section 508 assessment experience. Your agency components' responses are summarized below:

Experience Finding Section 508 Compliant Products	Number of Purchases	Percentage of Total Purchases	Percentage of Total Purchases in All Agencies in Your Size Category
(b1) There was more than one product fully meeting the applicable Section 508 standards and the component selected one of the products fully meeting the standards.	3	50.00%	40.9%
(b2) There was only one product fully meeting the applicable Section 508 standards and the component selected that product.	0	0.00%	11.8%
(b3i) No product met all of the Section 508 standards. We chose the product that best met the applicable Section 508 standards and included all FAR 39.203(c)(2) documentation.	0	0.00%	3.2%
(b3ii) No product met all the Section 508 standards. We chose the product that best met the applicable Section 508 standards but did not include the required documentation.	0	0.00%	4.3%
(b4i) No product met all of the Section 508 standards. We did not choose the product that best met the applicable Section 508 standards, but we included all FAR 39.203(c)(2) documentation.	0	0.00%	1.1%
(b4ii) No product met all of the Section 508 standards. We did not choose the product that best met the applicable Section 508 standards, and we did not include the required documentation.	0	0.00%	0.0%
(b5i) No product met any of the Section 508 standards. All FAR 39.203(c)(2) documentation was included.	1	16.67%	1.1%
(b5ii) No product met any of the Section 508 standards. All FAR 39.203(c)(2) documentation was not included.	1	16.67%	3.2%
(b6) Other.	1	16.67%	34.4%

Question 22 then asked how the contract specified test and acceptance of deliverables in light of the applicable Section 508 standards. This question also permitted your components to identify any number (or none) of six possible choices. Your agency components' responses are summarized below.

Product Testing	Number of Purchases	Percentage of Total Responses from All Components	Percentage of Total Responses For All Agencies in Your Size Category
(c1) Testing done in-house	1	12.50%	20.8%
(c2) Testing done by a third party	1	12.50%	11.3%
(c3) Review of material submitted	4	50.00%	15.1%
(c4) No evaluation	0	0.00%	20.8%
(c5) N/A. An exception was used.	2	25.00%	5.7%

| (c6) Other | 0 | 0.00% | 26.4% |

SECTION II – GENERAL PROCESSES FOR SECTION 508 IMPLEMENTATION

This section of the survey focused on general processes for implementing Section 508 within your agency. Three specific areas were analyzed:

- Software and other electronic and information technologies (E&IT)
- Information and documentation
- Other Rehabilitation Act concerns

The following report summarizes your agency's performance in each of these areas and identifies areas where your agency follows Section 508 implementation practices (if any exist) either consistent with other comparable Federal agencies or stands out from other agencies. This information should help guide you in making future decisions implementing Section 508.

Your agency was also asked several questions regarding other aspects of the Rehabilitation Act, such as Sections 501 and 504, which requires reasonable accommodations for people with disabilities. These Sections work closely with Section 508 in ensuring fair and equal access to all people with disabilities.

In general, components within the agency reported:

- Average results with respect to establishing and enforcing accessibility guidelines for the development of software, other E&IT, and multimedia productions. More specifically, while guidelines were in place, many components did not report that these guidelines were enforced uniformly.

- Your agency components reported lower numbers of closed-captioning for their multimedia productions than other comparable agencies.

- Your agency components gave average responses regarding most aspects of TTY availability, access, and compatibility.

A.   Software and Other Electronic and Information Technologies

Your agency reported a total of nine individual components participating in this survey. One component did not complete Section IIA because it was not responsible for its own electronic and information technology (E&IT) software developments or multimedia productions.

Question 1 asked whether your components developed their own software or other E&IT *other than web pages*. Those components that did not develop their own software were asked to skip the rest of Section A; they are not included in Questions 2-8. Your agency components' responses are summarized below:

Component Software Development	Number of Components Selecting this Option	Percentage of Total Components Selecting this Option	Percentage of Components Selecting this Option For All Agencies in Your Size Category
(a) Yes, software is developed in-house.	5	83.33%	65.0%
(b) Yes, but development is limited to contractors.	1	16.67%	19.5%
(c) No.	0	0.00%	15.5%

Question 2 asked whether your components established accessibility guidelines to ensure that your software and E&IT, developed either by your components or contractors, were accessible to people with disabilities. Your agency components' responses are summarized below:

Establishment of Accessibility Guidelines	Number of Components Selecting this Option	Percentage of Total Components Selecting this Option	Percentage of Components Selecting this Option For All Agencies in Your Size Category
(a) Yes, guidelines were established and were in place.	3	50.00%	64.4%
(b) No, but a timetable was established to do so.	0	0.00%	7.9%
(c) No, and there were no plans to create such guidelines.	0	0.00%	9.0%
(d) Yes and no. Some parts of the component did establish guidelines, but others did not.	3	50.00%	18.6%

Question 3 asked whether procedures were in place to ensure that in-house software developers followed your agency components' accessibility guidelines (when such guidelines existed). Your agency components' responses are summarized below:

Use of Accessibility Guidelines	Number of Components Selecting this Option	Percentage of Total Components Selecting this Option	Percentage of Components Selecting this Option For All Agencies in Your Size Category
(a) N/A. There were no accessibility guidelines in place.	0	0.00%	10.1%
(b) Yes, those who were responsible for development followed the guidelines.	3	50.00%	47.5%
(c) No. While some followed guidelines, there was no procedure in place to ensure that these guidelines were followed uniformly.	3	50.00%	31.3%
(d) No, but a timetable was established to do so.	0	0.00%	7.8%
(e) No, and there were no plans to enforce use of guidelines.	0	0.00%	3.4%

In **Question 4**, your agency components were asked whether procedures existed to ensure that accessibility guidelines were followed by your component's video and multimedia production developers (if any). Your agency components' responses are summarized below:

Use of Accessibility Guidelines	Number of Components Selecting this Option	Percentage of Total Components Selecting this Option	Percentage of Components Selecting this Option For All Agencies in Your Size Category
(a) N/A. All productions were procured or the component does not create any	3	42.86%	48.5%

recorded video or multimedia production.			
(b) N/A. There were no accessibility guidelines in place.	0	0.00%	2.5%
(c) Yes, those who were responsible for development followed the guidelines.	2	28.57%	27.0%
(d) No. While some followed guidelines, there was no procedure in place to ensure that these guidelines were followed uniformly.	2	28.57%	12.5%
(e) No, but a timetable was established to do so.	0	0.00%	6.0%
(f) No, and there were no plans to enforce use of guidelines.	0	0.00%	3.5%

Question 5 asked whether procedures were in place to ensure that accessibility guidelines (if any) were followed by people who developed live training and/or informational multimedia productions in your agency components. Your agency components' responses are summarized below:

Use of Accessibility Guidelines	Number of Components Selecting this Option	Percentage of Total Components Selecting this Option	Percentage of Components Selecting this Option For All Agencies in Your Size Category
(a) N/A. All productions were procured or the component does not create any recorded video or multimedia productions.	4	57.14%	49.0%
(b) N/A. There were no accessibility guidelines in place.	0	0.00%	4.0%
(c) Yes, those who were responsible for development followed the guidelines.	0	0.00%	23.0%
(d) No. While some followed guidelines, there was no procedure in place to ensure that these guidelines were followed uniformly.	3	42.86%	13.0%
(e) No, but a timetable was established to do so.	0	0.00%	7.0%
(f) No, and there were no plans to enforce use of guidelines.	0	0.00%	4.0%

Question 6 asked your agency components to provide information on accessibility for video and multimedia productions, if any were produced. Three components were unable to respond to this question, because they did not create multimedia productions (or procured all of their productions). Two components also could not respond to this question, because they did not track this information. Your agency components' responses are summarized below:

Accessibility Method	Number of Productions	Percentage of Total Productions	Percentage of Components Selecting this Option For All Agencies in Your Size Category

(a) Total number of productions created in FY2003	1		
(b) Closed captioned	1	33.33%	7.6%
(c) Open captioned	1	33.33%	3.1%
(d) Audio described	0	0.00%	2.4%

Question 7 asked your agency components to provide information on accessibility for live training and/or informational productions, if any were produced. Three components were unable to respond to this question, because they did not create multimedia productions (or procured all of their productions). Two components also could not respond to this question, because they did not track this information. Your agency components' responses are summarized below:

Accessibility Method	Number of Productions	Percentage of Total Productions	Percentage of Components Selecting this Option For All Agencies in Your Size Category
(a) Total number of productions created in FY2003	1200		
(b) Closed captioned	0	0.00%	29.9%
(c) Open captioned	0	0.00%	1.7%
(d) Audio described	0	0.00%	0.7%

In **Question 8**, an open-ended question, your agency components were asked to share additional information such as lessons learned or best practices they had adopted. One agency component reported that they had procured the HiSoftware suite to verify all web content for Section 508. One advantage of this software was HiCaption, which permitted them to caption all multimedia that is posted on the web. Another component said that they had no good Section 508 testing tools for web applications; 508 Bobby, for example, did not work for applications.

B.   Information and Documentation

Your agency reported a total of nine individual components participating in this survey. All components reported being responsible for their own electronic and information technology (E&IT) product support.

Question 9 pointed out that Section 1194.41(a) of the Access Board standards requires agencies to provide product support documentation for E&IT products to end users in alternate formats upon request. Your agency components were asked to identify the alternate formats used by your components, and the number of alternative format requests submitted. No requests were made within your agency. Overall, the Federal Government reported Braille to be the most common format, representing 31.35% of all alternate format requests.

6 components were unable to provide data because they reported that no requests were received. In addition, two components could not respond because they did not track this information. This question also permitted your components to identify any number (or none) of five possible choices. Your agency components' responses are summarized below:

Alternative Format	Total Number of Requests	Percentage of Total Responses from All Components	Percentage of Total Responses For All Agencies in Your Size Category
(a) Braille	0	0.00%	11.9%
(b) ASCII text	0	0.00%	35.7%
(c) Large print	0	0.00%	35.7%
(d) Recorded audio	0	0.00%	3.6%
(e) Other	0	0.00%	13.1%

Question 10 pointed out that Section 1194.41(b) requires agencies to provide access to descriptions of the accessibility and compatibility features of E&IT products to end users in alternative formats or alternative methods upon request. Your agency components were asked to identify the alternative formats and methods used by your components, and the number of requests received for each format, although not for each method. No requests for alternative formats were made.

5 components were unable to provide data because they reported that no requests were received. In addition, two components could not respond because they did not track this information. This question also permitted your components to identify any number (or none) of five possible choices. Your agency components' responses are summarized below:

Alternative Format	Total Number of Requests	Percentage of Total Responses from All Components	Percentage of Total Responses For All Agencies in Your Size Category
(a1) Braille	0	0.00%	2.0%
(a2) ASCII text	0	0.00%	6.1%
(a3) Large print	0	0.00%	59.2%
(a4) Recorded audio	0	0.00%	24.5%
(a5) Other	0	0.00%	8.2%

Also, your components were asked to identify the alternative methods used. One component reported that it did not track this data and three indicated that they received no such requests. This question also permitted your components to identify any number (or none) of nine possible choices. Your agency components' responses are summarized below:

Alternative Method	Number of Components Using this Method	Percentage of Total Responses from All Components	Percentage of Total Responses For All Agencies in Your Size Category
(b1) Voice	0	0.00%	16.1%
(b2) Fax	0	0.00%	7.1%
(b3) Relay service	1	20.00%	6.3%
(b4) TTY	1	20.00%	20.5%
(b5) Internet	0	0.00%	9.8%

posting			
(b6) Captioning	1	20.00%	9.8%
(b7) Text to speech synthesis	1	20.00%	19.6%
(b8) Audio description	0	0.00%	7.1%
(b9) Other	1	20.00%	3.6%

C.   Other Rehabilitation Act Concerns

Your agency reported a total of nine individual components participating in this survey. Two components did not complete Section IIC because they were not responsible for their own electronic and information technology (E&IT) product support.

Question 11 asked your components whether they had made information available to all employees on using TTYs, the Telephone Relay Service (TRS), and the Federal Relay Service (FRS). Your agency components' responses are summarized below:

TTY/Relay Services Information Availability	Number of Components Selecting this Option	Percentage of Total Components Selecting this Option	Percentage of Components Selecting this Option For All Agencies in Your Size Category
(a) Yes. The information was available on the website for all employees.	2	40.00%	30.3%
(b) Yes, but this information was not available on the website for all employees.	0	0.00%	30.3%
(c) No, but there were plans to make this information available to all employees on the website.	2	40.00%	20.6%
(d) No, and there were no plans to do so.	1	20.00%	18.7%

Question 12 asked those who responded negatively to Question 11 on whether this information was *specifically* available to all employees who regularly receive calls from the general public or from employees with disabilities. Your agency components' responses are summarized below:

TTY/Relay Services Information Availability for Specific Employees	Number of Components Selecting this Option	Percentage of Total Components Selecting this Option	Percentage of Components Selecting this Option For All Agencies in Your Size Category
(a) N/A. "Yes" was answered for Question 11	0	0.00%	46.3%
(b) Yes. The information was available on the website for these employees.	2	66.67%	5.2%

	Number of Components Selecting this Option	Percentage of Total Components Selecting this Option	Percentage of Components Selecting this Option For All Agencies in Your Size Category
(c) Yes, but this information was not available on the website for these employees.	0	0.00%	11.9%
(d) No, but there were plans to make this information available to these employees on the website.	1	33.33%	17.9%
(e) No, and there were no plans to do so.	0	0.00%	18.7%

In **Question 13**, you were asked whether or not your components provided TTYs, outlets, and shelves wherever telephones were provided for members of the public. Your agency components' responses are summarized below:

TTY Availability	Number of Components Selecting this Option	Percentage of Total Components Selecting this Option	Percentage of Components Selecting this Option For All Agencies in Your Size Category
(a) Yes.	1	50.00%	24.8%
(b) No, but a timetable was established to do so.	0	0.00%	8.7%
(c) No, and there were no plans to do so.	0	0.00%	45.6%
(d) Yes and no. Some parts of the component did provide TTYs, while others did not.	1	50.00%	20.8%

Question 14 asked your components whether or not they had installed a dedicated TTY line wherever they received a large volume of incoming calls. Your agency components' responses are summarized below:

Dedicated TTY Line Availability	Number of Components Selecting this Option	Percentage of Total Components Selecting this Option	Percentage of Components Selecting this Option For All Agencies in Your Size Category
(a) Yes.	1	20.00%	42.0%
(b) No, but a timetable was established to do so.	1	20.00%	7.3%
(c) No, and there were no plans to do so.	0	0.00%	30.7%
(d) Yes and no. Some parts of the component did provide a dedicated TTY line, while others did not.	3	60.00%	20.0%

Question 15 asked whether or not your agency components had tested and configured their interactive telephone systems (if any) to be compatible with TTYs. Your agency components' responses are summarized below:

Response	Number of Components Selecting this Option	Percentage of Total Components Selecting this Option	Percentage of Components Selecting this Option For All Agencies in Your Size Category
(a) Yes.	0	0.00%	29.9%
(b) No, but a timetable was established to do so.	2	50.00%	10.2%
(c) No, and there were no plans to do so.	0	0.00%	42.2%
(d) Yes and no. Some parts of the component did so, while others have not done so.	2	50.00%	17.7%

Question 16 asked if your components had operators available on interactive automated telephone services (if any) for assisting persons with disabilities. Your agency components' responses are summarized below

Special Operator Availability	Number of Components Selecting this Option	Percentage of Total Components Selecting this Option	Percentage of Components Selecting this Option For All Agencies in Your Size Category
(a) Yes.	1	20.00%	23.2%
(b) No, but a timetable was established to do so.	1	20.00%	7.3%
(c) No, and there were no plans to do so.	1	20.00%	28.5%
(d) Yes and no. Some parts of the component did make operators available for assistance, while others did not.	1	20.00%	16.6%
(e) N/A. The component did have interactive automated telephone services.	1	20.00%	24.5%

In **Question 17**, your components were asked whether they maintained separate toll-free TTY lines providing equivalent information and services in addition to their regular toll-free information lines. Your agency components' responses are summarized below:

Separate Toll-Free TTY Line Availability	Number of Components Selecting this Option	Percentage of Total Components Selecting this Option	Percentage of Components Selecting this Option For All Agencies in Your Size Category
(a) Yes.	1	20.00%	22.4%
(b) No, but a timetable was established for doing so.	0	0.00%	6.6%

(c) No, and there were no plans to do so.	2	40.00%	30.3%
(d) Yes and no. Some parts of the component did so, while others did not.	1	20.00%	15.8%
(e) N/A. The component did have toll-free telephone lines.	1	20.00%	25.0%

In **Question 18** your agency components were asked to provide any insights such as lessons learned or best practices adopted for dealing with general processes for Section 508 implementation. Your agency provided no answers in response to this question.

SECTION III – ADMINISTRATIVE COMPLAINTS AND CIVIL ACTIONS

This section of the survey focused on administrative complaints and civil actions related to Section 508 within your agency. Two specific areas were analyzed:

- Policies and procedures for handing complaints under Section 508
- Number of complaints and judicial actions

The following report summarizes your agency's performance in each of these areas and identifies areas where your agency follows administrative practices consistent with other comparable Federal agencies. This information is provided to assist your agency in making future decisions regarding Section 508 compliance regarding administrative complaints and civil actions.

For technical assistance on the proper procedures for handling and resolving civil rights complaints, generally, you may wish to consult Investigations Procedures Manual for the Investigation and Resolution of Complaints Alleging Violations of Title VI and Other Nondiscrimination Statutes (Investigative Procedures Manual), published by the Coordination and Review Section, Civil Rights Division, of the U.S. Department of Justice.

Your agency reported a total of nine individual components participating in this survey. Two components did not complete Section III because they were not responsible for receiving or processing their own administrative complaints.

Overall, agency components did not report the existence of a complaint process specific for Section 508. Instead they reported using their pre-existing Section 504 process. Nevertheless, components reported the inclusion of ADR principles in these processes, and higher-than-average numbers with regard to the dissemination of information about these complaint processes. No Section 508-related complaints or judicial actions were reported.

A. Policies and Procedures for Handling Complaints Under Section 508

Question 1 asks whether your components had examined their existing complaint-handling processes applicable to complaints filed under Section 504 for federally conducted activities and tailored them to the Section 508 context, The entire Federal government reported that 41.4% of their total agency components had already transitioned their Section 504 process to the Section 508 context. Your agency components' responses are summarized below:

Section 504-508 Process Transition	Number of Components Selecting this Option	Percentage of Total Components Selecting this Option	Percentage of Components Selecting this Option For All Agencies in Your Size Category
(a) Yes, there was an appropriate set of policies and procedures in place specifically to handle Section 508 complaints when they arose.	0	0.00%	35.1%
(b) No, but there was an established timetable to tailor the existing complaint processes to the context of Section 508.	0	0.00%	6.2%
(c) No, the Section 504 process was used to handle Section 508 complaints.	3	60.00%	36.1%
(d) Other	2	40.00%	22.7%

In **Question 2**, your agency components was asked whether they had incorporated Alternative Dispute Resolution (ADR), such as mediation or arbitration, into their existing administrative complaint resolution process. Your agency components' responses are summarized below:

ADR Incorporation	Number of Components Selecting this Option	Percentage of Total Components Selecting this Option	Percentage of Components Selecting this Option For All Agencies in Your Size Category
(a) Yes, the existing complaint processes included an ADR component.	3	60.00%	76.1%
(b) Yes and no. Different parts of the component handled complaints differently, and some have incorporated ADR principles.	2	40.00%	14.1%
(c) No, ADR principles were not incorporated into the complaint resolution processes.	0	0.00%	9.8%

Question 3 asked your components if they had widely disseminated instructions to the public and to employees regarding how to file administrative complaints under Section 508. They were allowed to answer both (a) and (b) if applicable. This question also permitted your components to identify any number (or none) of four possible choices. Your agency components' responses are summarized below:

Complaint Filing Information Availability	Number of Components Selecting this Option	Percentage of Total Responses from All Components	Percentage of Total Responses For All Agencies in Your Size Category
(a) Yes, this information was available for employees.	3	50.00%	36.3%
(b) Yes, this information was available for the public.	1	16.67%	24.2%
(c) No, but a timetable was established to do so.	1	16.67%	26.6%
(d) No, and there were plans to do so.	1	16.67%	12.9%

In **Question 4**, your agency components were asked to provide any insights such as lessons learned or best practices adopted for dealing with policies and procedures for handling Section 508 administrative complaints. Your agency provided no answers in response to this question.

B. Number of Complaints and Judicial Actions

Questions 5-10 concern the number of complaints and judicial actions filed, assessed, and resolved. Your components were asked to answer the following questions using information about complaints filed since the effective date, June 21, 2001. The Federal government reported no administrative or judicial complaints during the survey period.

Question 9 asked for a full listing of all docket numbers and courts in which the judicial actions were decided. However, since there were no judicial complaints reported, there are also no docket numbers to report.

SECTION IV – WEBSITE COMPLIANCE

This section of the survey focused on website compliance with Section 508. Specifically, this section focused on two areas:

- Web policies and practices
- Top twenty web pages

The following report summarizes your agency's performance in each of these areas and identifies areas where your agency follows web accessibility practices consistent with other comparably sized Federal agencies. This information is provided to assist you in making future decisions regarding Section 508 website compliance.

The Department of Justice has worked closely with the Access Board and the General Services Administration to develop technical assistance material to assist web developers in developing accessible content. This information has also been reviewed by the U.S. Department of Education and other agencies with expertise in developing accessible web content. An excellent web based training course based on this material can be found in the 508 Universe at http://www.section508.gov.

In general, your agency components reported an above-average level of success in implementing and enforcing web design policies that incorporates accessibility, and an average level of success in making web pages accessible. In many instances, components reporting avoiding accessibility problems by using more-accessible technologies and refraining from using less-accessible technologies.

However, components reported difficulty with respect to specific accessibility issues:

- Custom style sheet (CSS) interference
- Redundant links for server-side image maps
- Table row/column header identification
- Frame titles
- Screen flicker exceeding the acceptable range
- Equivalent text for JavaScript/Flash programs availability
- PDF file accessibility
- Alternate, accessible forms availability
- Navigational link skipping
- Time limits on pages

A. Web Policies and Practices

Question 1 asked whether your components maintained a website. Your agency components' responses are summarized below:

Website Maintenance	Number of Components Selecting this Option	Percentage of Total Components Selecting this Option
(a) Yes, we maintain a website.	8	100.00%
(b) No, we do not maintain a website.	0	0.00%

The rest of Section IV concerned only those components who maintained a website.

Question 2 asked how your components create and maintain their websites. Your agency components' responses are summarized below:

Website Creation and Maintenance	Number of Components Selecting this Option	Percentage of Total Components With Websites Selecting this Option	Percentage of Components Selecting this Option For All Agencies in Your Size Category
(a) Yes, the staff created its own web pages and posted those pages to a dedicated web server.	6	75.00%	60.4%
(b) Yes and no. The component created the web pages, but another entity maintained them.	0	0.00%	3.0%
(c) Yes and no. Another entity created the web pages but the component maintained them.	0	0.00%	2.1%
(d) Yes and no. Some parts of the component created and maintained their own web pages, while others adopted a different practice.	2	25.00%	23.8%
(e-i) No. An independent contractor created and maintained the web pages.	0	0.00%	6.8%
(e-ii) No. Another Federal agency created and maintained the web pages.	0	0.00%	0.0%
(e-iii) No. Another entity created and maintained the web pages.	0	0.00%	3.8%

In **Question 3**, your components were asked whether they have established web accessibility guidelines to ensure that their web pages (both public and private) were accessible to people with disabilities. Your agency components' responses are summarized below:

Web Accessibility Guidelines	Number of Components Selecting this Option	Percentage of Total Components With Websites Selecting this Option	Percentage of Components Selecting this Option For All Agencies in Your Size Category
(a) Yes, guidelines were established and they were in place.	4	80.00%	54.5%
(b) No, but a timetable was established to do so.	0	0.00%	2.2%
(c) No, and there were no plans to do so.	0	0.00%	0.9%
(d) Yes and no. Some parts of the component had guidelines, while others did not.	1	20.00%	7.4%

	Number of Components Selecting this Option	Percentage of Total Components With Websites Selecting this Option	Percentage of Components Selecting this Option For All Agencies in Your Size Category
(e) Yes and no. While the component had not created specific guidelines, they followed guidelines imposed by other portions of the department or agency.	0	0.00%	35.1%

Question 4 asked whether procedures existed to ensure that the component's accessibility guidelines (if any) were followed by those who have responsibility for website content. Your agency components' responses are summarized below:

Web Accessibility Guidelines Compliance	Number of Components Selecting this Option	Percentage of Total Components With Websites Selecting this Option	Percentage of Components Selecting this Option For All Agencies in Your Size Category
(a) N/A. There were no web accessibility guidelines in place.	0	0.00%	3.9%
(b) Yes, those who were responsible for web content followed the accessibility guidelines.	6	75.00%	75.7%
(c) No. While some in the component followed the guidelines, there was no procedure in place to ensure compliance.	2	25.00%	16.1%
(d) No, but a timetable was established to do so.	0	0.00%	3.9%
(e) No, and there were no such plans.	0	0.00%	0.4%

In **Question 5**, your agency components were asked to check off a list of special topics that had been addressed by their web accessibility guidelines (if any). Your agency components' responses are summarized below:

Web Accessibility Special Topics	Number of Components Selecting this Option	Percentage of Total Components With Websites Selecting this Option	Percentage of Components Selecting this Option For All Agencies in Your Size Category
(a) N/A. We don't have web accessibility guidelines.	3	17.65%	14.9%
(b) Adobe Acrobat files (.pdfs)	4	23.53%	68.2%
(c) Microsoft PowerPoint files	3	17.65%	43.8%
(d) Macromedia Flash content	3	17.65%	36.8%
(e) Macromedia Shockwave content	0	0.00%	26.0%

(f) JavaScript or other scripting languages	2	11.76%	59.9%
(g) Java applets	2	11.76%	35.1%

Question 6 asked about the existence of a designated and advertised e-mail address to allow people with disabilities to inform the component of accessibility problems encountered on the website. Your agency components' responses are summarized below:

Designated E-Mail Address	Number of Components Selecting this Option	Percentage of Total Components With Websites Selecting this Option	Percentage of Components Selecting this Option For All Agencies in Your Size Category
(a) Yes, such an e-mail address and instructions for its use were available on the website.	6	75.00%	70.7%
(b) No, but a telephone number and TTY number were posted on the website for users with disabilities.	0	0.00%	3.9%
(c) No, but a timetable was established to do so.	0	0.00%	7.0%
(d) No, and there were no plans to do so.	1	12.50%	9.2%
(e) Other	1	12.50%	9.2%

Question 7, an open-ended question, invited your components to give feedback, such as lessons learned or best practices they have adopted, regarding web accessibility policies and practices. Your agency provided no answers in response to this question.

B.   Top Twenty Web Pages

Your agency components were also asked to review the accessibility of their top twenty web pages. This section summarizes all of these pages collectively and compares your results with other agencies of comparable size.

Question 1 asked your components to provide the URLs for their top twenty web pages. **The list, broken down by components, can be found in Appendix B.**

Question 2 asked for the best description of the purpose of each page. Your agency components' responses are summarized below:

Purpose of Web Page	Number of Web Pages	Percentage of Total Web Pages Identified	Percentage of Total Web Pages in All Agencies in Your Size Category
(a) Web-based Applications	32	29.36%	7.9%
(b) Online Forms for Receipt	0	0.00%	0.7%

of Services or Benefits			
(c) Miscellaneous Online Forms	3	2.75%	1.1%
(d) Instructions for Receipt of Services or Benefits	0	0.00%	5.2%
(e) Description of Activities of the Components	55	50.46%	51.7%
(f) Employment Postings	1	0.92%	2.5%
(g) Inherently Graphical Content	1	0.92%	1.3%
(h) Other	17	15.60%	29.5%

Question 3 asked your agency components about the page's public accessibility. Your agency components' responses are summarized below:

Public Accessibility	Number of Web Pages	Percentage of Total Web Pages Identified	Percentage of Total Web Pages in All Agencies in Your Size Category
(a) Publicly accessible	100	91.74%	86.8%
(b) Not publicly accessible or had restricted access	5	4.59%	11.3%
(c) A combination of both	4	3.67%	1.9%

Question 4 asked the frequency of each one of the 20 pages that each component listed. For statistical information, we have averaged this frequency among all 20 pages per component. Your agency components reflected an overall average frequency of 405,945 visits per week. Nine of your components said they had no way of tracking this information.

Question 5 asked about the use of "alt" (alternative text attribute) or other descriptive elements to represent non-text elements in the page. They are chiefly used to provide visual information for people with visual impairments. Your agency components' responses are summarized below:

Text Equivalence	Number of Web Pages	Percentage of Total Web Pages Identified	Percentage of Total Web Pages in All Agencies in Your Size Category
(a) Contained meaningful description for every non-text element	91	81.98%	79.2%
(b) Contained meaningful description for some non-text elements, but not all	5	4.50%	10.4%
(c) Did not have text equivalents of non-text elements	2	1.80%	1.7%
(d) N/A. Did not have non-text elements	13	11.71%	8.7%

Question 6 asked about the use of text captioning and descriptive narration for multimedia content. Such accessibility features are used to make multimedia features more available for users with hearing and/or visual impairments. Your agency components' responses are summarized below:

Multimedia Content Accessibility	Number of Web Pages	Percentage of Total Web Pages Identified	Percentage of Total Web Pages in All Agencies in Your Size Category
(a) Contained text captioning and descriptive narration for all multimedia content	0	0.00%	2.7%
(b) Contained audio descriptions for all important visual information, but no text captioning for audible output	0	0.00%	0.3%
(c) Contained text captioning for all audible output, but no audio descriptions for important visual information	0	0.00%	0.6%
(d) Did not provide either accessibility feature	0	0.00%	1.7%
(e) N/A. Did not have multimedia content	110	100.00%	94.8%

Question 7 asked whether the audio description and text captions were synchronized with their associated dynamic content. This synchrony allows the multimedia content to be even more accessible and readily understood by users with hearing and/or visual impairments. Your agency components' responses are summarized below:

Multimedia Content Accessibility Synchronization	Number of Web Pages	Percentage of Total Web Pages Identified	Percentage of Total Web Pages in All Agencies in Your Size Category
(a) Text captioning and descriptive narration were completely synchronized with changes in the dynamic content of the page.	12	10.81%	3.2%
(b) Text captioning was not completely synchronized, but audio description was synchronized.	0	0.00%	0.2%
(c) Audio description was not completely synchronized, but text captioning was.	2	1.80%	0.2%
(d) Both were provided, but neither is synchronized.	0	0.00%	0.9%
(e) N/A. There was no multimedia content on the page.	97	87.39%	95.5%

Question 8 inquires as to the accessibility of your components' top twenty pages for users with varying degrees of color-blindness. Your agency components' responses are summarized below:

Appropriate Use of Color	Number of Web Pages	Percentage of Total Web Pages Identified	Percentage of Total Web Pages in All Agencies in Your Size Category
(a) The page used color appropriately.	83	76.85%	85.0%
(b) The page did not use color appropriately.	0	0.00%	0.5%
(c) N/A. The page made no use of color.	25	23.15%	14.5%

In **Question 9**, the use of Cascading Style Sheets (CSS) or JavaScript style sheets in the web pages was examined, and your components were asked whether the web page was viewable if the corresponding style sheet was deactivated. Your agency components' responses are summarized below:

Style Sheet Usability	Number of Web Pages	Percentage of Total Web Pages Identified	Percentage of Total Web Pages in All Agencies in Your Size Category
(a) The page was viewable without style sheets.	31	28.70%	61.6%
(b) The page became unreadable when style sheets were turned off.	1	0.93%	0.9%
(c) N/A. The page does not use style sheets.	76	70.37%	37.6%

Question 10 asked whether the style sheet, if used, was designed so that it does not interfere with custom style sheets set by the browser. Your agency components' responses are summarized below:

Style Sheet Interference	Number of Web Pages	Percentage of Total Web Pages Identified	Percentage of Total Web Pages in All Agencies in Your Size Category
(a) The style sheet worked without interfering with custom style sheets set by the browser.	18	16.51%	60.5%
(b) The style sheet interfered with the custom style sheets set by the browser.	2	1.83%	1.3%
(c) N/A. The page did not use style sheets.	89	81.65%	38.3%

Question 11 asked your components to provide information on the use of server-side image maps and whether duplicate text links were provided for all links within the image maps. Your agency components' responses are summarized below:

Server Side Image Map Accessibility	Number of Web Pages	Percentage of Total Web Pages Identified	Percentage of Total Web Pages in All Agencies in Your Size Category
(a) Each link in the server-side image maps was duplicated by a separate text link.	5	4.59%	2.2%
(b) Some of the links from the server-side image maps were duplicated, while others were not.	0	0.00%	0.8%
(c) Redundant text links were not provided for any link from the server-side image maps	12	11.01%	0.6%
(d) N/A. The page did not include any server-side image maps.	92	84.40%	96.4%

Question 12 continues the image maps query by asking whether a timetable has been established to replace the server-side image maps with client-side image maps, except where the regions cannot be defined with an available geometric shape. Your agency components' responses are summarized below:

Client-Side Image Map Transition	Number of Web Pages	Percentage of Total Web Pages Identified	Percentage of Total Web Pages in All Agencies in Your Size Category
(a) Yes, a timetable was established.	12	10.81%	1.0%
(b) No, a timetable was not established.	0	0.00%	1.7%
(c) N/A. The page did not use image maps.	99	89.19%	97.3%

Question 13, focusing on client-side image maps, asks whether each map region has a text equivalent via "alt" (alternative text attribute) or an otherwise meaningful description accompanying it. Your agency components' responses are summarized below:

Client-Side Image Map Accessibility	Number of Web Pages	Percentage of Total Web Pages Identified	Percentage of Total Web Pages in All Agencies in Your Size Category
(a) Meaningful text descriptions accompanied every non-text element associated with the image map.	39	35.78%	17.8%
(b) Meaningful text descriptions were provided for some of the non-text elements, but not all.	1	0.92%	1.6%
(c) None of the non-text elements in the image maps had any text equivalent.	4	3.67%	0.9%
(d) N/A. The page did not include any client-side image maps.	65	59.63%	79.8%

Question 14 inquires about data in tables. Your components were asked whether each cell in a table was provided identification of row and column headers (when such table headers existed). Your agency components' responses are summarized below:

Row/Column Header Identification	Number of Web Pages	Percentage of Total Web Pages Identified	Percentage of Total Web Pages in All Agencies in Your Size Category
(a) Each cell within the table included identification of row and column headers	27	24.55%	15.0%
(b) Some cells within the table failed to identify row and column headers	5	4.55%	6.8%
(c) The page included tables, but there was no identification of row or column headers	21	19.09%	15.1%
(d) N/A. The page did not have tables with row or column headers.	57	51.82%	63.1%

Question 15 asked your components whether descriptive titles were used for web pages with frames. Your agency components' responses are summarized below:

Frame Accessibility	Number of Web Pages	Percentage of Total Web Pages Identified	Percentage of Total Web Pages in All Agencies in Your Size Category
(a) Frames on the web page had meaningful titles.	3	2.80%	5.7%
(b) Frames on the web page did not have meaningful titles.	3	2.80%	1.0%
(c) N/A. The page did not use frames.	101	94.39%	93.3%

Question 16 asked your components to provide information on whether content (such as applets or plug-ins) could cause the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz. Your agency components' responses are summarized below:

Screen Flicker Issues	Number of Web Pages	Percentage of Total Web Pages Identified	Percentage of Total Web Pages in All Agencies in Your Size Category
(a) Yes, the page included content that could cause the screen to flicker greater than 2 Hz and lower than 55 Hz.	10	9.17%	1.0%
(b) No, the page did not include content that exceeded the defined flicker rate range.	13	11.93%	17.7%
(c) N/A. The web page had no discernable flicker and used no applets or content plug-ins.	86	78.90%	82.3%

Question 17 asked whether equivalent text was made available for pages using JavaScript or Macromedia Flash scripts that affected content displayed to the user. Your agency components' responses are summarized below:

Java/Flash Accessibility	Number of Web Pages	Percentage of Total Web Pages Identified	Percentage of Total Web Pages in All Agencies in Your Size Category
(a) Equivalent text was included for all JavaScript or Flash content.	33	30.56%	18.3%
(b) Equivalent text was unnecessary because the script provided information directly to assistive technology.	24	22.22%	11.9%
(c) Neither the page nor the script contained equivalent text.	19	17.59%	8.0%
(d) N/A. The page did not include JavaScript or Flash content.	32	29.63%	61.8%

Question 18 inquired about the use of applets and whether the same information and functionality in the applet was also included in an accessible format. Your agency components' responses are summarized below:

Applet Accessibility	Number of Web Pages	Percentage of Total Web Pages Identified	Percentage of Total Web Pages in All Agencies in Your Size Category
(a) The page contained the same information and functionality in an accessible format as in the applet.	3	2.75%	1.1%
(b) The page did not include applet information in an accessible format.	0	0.00%	1.1%
(c) N/A. The page did not use any applets.	106	97.25%	97.8%

Question 19 focuses on programmatic objects (such as Flash, Shockwave, RealAudio, or RealVideo content). Your components were asked whether the page included a link to the plug-in or programmatic item required for accessing the content of the page, and whether that plug-in or programmatic item itself was accessible to people with disabilities. Your agency components' responses are summarized below:

Programmatic Object Accessibility	Number of Web Pages	Percentage of Total Web Pages Identified	Percentage of Total Web Pages in All Agencies in Your Size Category
(a) The page used programmatic objects, included a link to the plug-ins, and these plug-ins were accessible.	5	4.55%	4.3%
(b) The page did include programmatic objects and links to plug-ins, but those plug-ins were not accessible.	1	0.91%	0.3%

	Number of Web Pages	Percentage of Total Web Pages Identified	Percentage of Total Web Pages in All Agencies in Your Size Category
(c) The page used programmatic objects, but links to the plug-ins were not included.	1	0.91%	1.2%
(d) N/A. The page did not use programmatic objects.	103	93.64%	94.2%

Question 20 asked whether Adobe Acrobat .pdf files, if present, were created in such a way that is likely to maximize their usability for people with disabilities. Your agency components' responses are summarized below:

Acrobat .PDF Usability	Number of Web Pages	Percentage of Total Web Pages Identified	Percentage of Total Web Pages in All Agencies in Your Size Category
(a) Yes. The .pdf files were created either by "printing to .pdf" or running them through an OCR process.	32	29.91%	29.1%
(b) Some files were made accessible by the two above methods, but others are not.	9	8.41%	6.2%
(c) The page included .pdfs that were not made accessible either by "printing to .pdf" or running them through an OCR process.	5	4.67%	5.1%
(d) N/A. The page did not include any .pdf links.	61	57.01%	59.5%

Question 21 asked about electronic forms to be completed online. Specifically, your components were asked whether each form permitted users of assistive technology to access the information, field elements, and functionality required for completion and submission of the form including all directions and cues. Your agency components' responses are summarized below:

Electronic Form Accessibility	Number of Web Pages	Percentage of Total Web Pages Identified	Percentage of Total Web Pages in All Agencies in Your Size Category
(a) Each form complied with all the accessibility requirements and has been tested for usability.	27	24.55%	14.2%
(b) All the forms were compliant, but not all of them were tested for usability.	7	6.36%	3.6%
(c) All the forms were tested for usability, but they might not have complied with all accessibility requirements.	14	12.73%	3.1%
(d) The page contained one or more forms that were inaccessible to people with disabilities.	2	1.82%	3.3%
(e) N/A. The page did not contain any forms.	60	54.55%	75.7%

Question 22 continued the query about forms. Your components were asked if any inaccessible forms had alternate accessible forms available for people with disabilities. Your agency components' responses are summarized below:

Alternate Accessible Form Availability	Number of Web Pages	Percentage of Total Web Pages Identified	Percentage of Total Web Pages in All Agencies in Your Size Category
(a) All inaccessible forms had alternate accessible forms.	12	11.54%	4.5%
(b) The inaccessible forms on the page did not have alternate accessible forms.	10	9.62%	5.2%
(c) N/A. The page either did not have any forms, or included forms which were all accessible.	82	78.85%	90.3%

Question 23 asked your components whether navigational links to other web pages within the same website had special links that allowed screen readers to skip over those navigational links. Your agency components' responses are summarized below:

Navigational Link Skipping	Number of Web Pages	Percentage of Total Web Pages Identified	Percentage of Total Web Pages in All Agencies in Your Size Category
(a) Special links for screen readers were included in the page.	58	53.70%	57.7%
(b) No, there were no special links to allow screen readers to skip over navigational links.	33	30.56%	28.8%
(c) N/A. The page did not have any navigational links to other web pages within the same website.	17	15.74%	13.5%

Question 24 focused on pages that impose a time limit on the user. More specifically, were users alerted that he or she would be timed out and given sufficient time to indicate that more time was needed before actually being timed out? Your agency components' responses are summarized below:

Time Limits	Number of Web Pages	Percentage of Total Web Pages Identified	Percentage of Total Web Pages in All Agencies in Your Size Category
(a) Yes, the user was alerted about the time limit and was given an opportunity to indicate that more time is needed.	3	2.73%	1.1%
(b) While the page did inform the user about the time limit, the user was not given an opportunity to increase the allocated time.	1	0.91%	0.2%
(c) The page timed out without giving any warning to the user.	3	2.73%	1.2%
(d) N/A. The page did not have any time limit.	103	93.64%	97.5%

Question 25 asked components to take into consideration the previous 24 questions, and then asked whether, if the reviewed page was likely to provide barriers to people with disabilities, an alternative text-only page was provided. Did that text-only page possess the same information, and was it updated as often as the regular page? Your agency components' responses are summarized below:

Alternative Text-Only Page Availability	Number of Web Pages	Percentage of Total Web Pages Identified	Percentage of Total Web Pages in All Agencies in Your Size Category
(a) Yes, an alternative text-only page was provided with the same information as the regular page and was updated equally as often.	29	29.90%	7.6%
(b) The text-only page was available but was not synchronized with the regular page.	0	0.00%	0.0%
(c) There was no text-only alternative page.	7	7.22%	8.9%
(d) N/A. The page did not appear to contain barriers for people with disabilities, so an alternative text-only page was not needed.	46	47.42%	76.8%
(e) N/A. Even if the page did not contain any barriers, the component maintained a text-only page anyway that had the same information and was updated as often.	15	15.46%	6.7%

Question 26 asked your agency components to test the pages for accessibility to people with disabilities using assistive technology (including a screen reader, the Lynx public-domain text-only browser, or the IBM Home Page Reader) and describe the results of their test. Your agency component reported success with most of the pages tested. Minor problems were detected and corrected. Some ALT tags were confusing when read through a screen reader, but were corrected later. The only major issue reported was a web page that used a JavaScript menu system; this was inaccessible but no remediation was reported.

Question 27, an open-ended question, asked your components to describe the accessibility successes and challenges identified during the evaluation of the web pages and any plans for addressing these problems site-wide. Your agency components reported that they encountered significant accessibility challenges. A few components said that they were not sure how to use screen readers to test their websites. Among the most common issues raised were JavaScript applets, table row/column header labeling, and PDF files. One component reported that they had designed the website to accommodate those with moderate visual impairments, and would need to reassess it again for the totally blind. Also, one component said they would need to create some kind of alternative for their webcam feature.

APPENDIX A
List of All Components and DAOs Identified

In Appendix A, all components and their Designated Agency Official (DAO) are identified and listed.

Name	E-Mail Address	Component
Bernie Gordon	bgordon@osmre.gov	Office of Surface Mining/OSMRE
Robert Gabor	rgabor@usbr.gov	Bureau of Reclamation/Web
Nancy Trent	nancy_trent@os.doi.gov	National Park Service
Nancy Trent	nancy_trent@os.doi.gov	Fish & Wildlife Service
Nancy Trent	nancy_trent@os.doi.gov	U.S. Geological Survey
Sharon Williams	Sharon_d_williams@nbc.gov	National Business Center
Dev Nayak	Dev.Nayak@mms.gov	Minerals Management Service

APPENDIX B
Top Twenty Pages Identified By Each Component

In Appendix B, the top twenty pages provided by each one of your components are listed.

DOI/Bureau of Land Management	htp://web.co.blm.gov/index.htm
DOI/Bureau of Land Management	http://www.ak.blm.gov
DOI/Bureau of Land Management	http://www.blm.gov/index.htm
DOI/Bureau of Land Management	http://www.blm.gov/nhp/index.htm
DOI/Bureau of Land Management	http://www.ca.blm.gov
DOI/Bureau of Land Management	http://www.co.blm.gov/index2.htm
DOI/Bureau of Land Management	http://www.fire.blm.gov
DOI/Bureau of Land Management	http://www.geodata.gov
DOI/Bureau of Land Management	http://www.glorecords.blm.gov/patentsearch/default.asp
DOI/Bureau of Land Management	http://www.glorecords.blm.gov/patentsearch/detail.asp
DOI/Bureau of Land Management	http://www.nm.blm.gov
DOI/Bureau of Land Management	http://www.ut.blm.gov
DOI/Bureau of Land Management	http://www.ut.blm.gov/monument
DOI/Bureau of Land Management	http://www.web.co.blm.gov/index.htm
DOI/Bureau of Land Management	http://www.wildhorseandburro.blm.gov/index.htm
DOI/Bureau of Land Management	http://www.wy.blm.gov/index.html
DOI/Bureau of Land Management	www.wy.blm.gov/wildhorses/index.htm

DOI/Bureau of Reclamation/web	http://www.usbr.gov
DOI/Bureau of Reclamation/web	http://www.usbr.gov/gp/
DOI/Bureau of Reclamation/web	http://www.usbr.gov/lc/hooverdam/
DOI/Bureau of Reclamation/web	http://www.usbr.gov/lc/hooverdam/Coupon.htm
DOI/Bureau of Reclamation/web	http://www.usbr.gov/lc/hooverdam/educate/
DOI/Bureau of Reclamation/web	http://www.usbr.gov/lc/hooverdam/History/
DOI/Bureau of Reclamation/web	http://www.usbr.gov/lc/hooverdam/History/faqs.html
DOI/Bureau of Reclamation/web	http://www.usbr.gov/lc/hooverdam/service/
DOI/Bureau of Reclamation/web	http://www.usbr.gov/lc/hooverdam/service/directions.htm
DOI/Bureau of Reclamation/web	http://www.usbr.gov/lc/hooverdam/traffic.htm
DOI/Bureau of Reclamation/web	http://www.usbr.gov/lc/region/
DOI/Bureau of Reclamation/web	http://www.usbr.gov/lc/region/lcrivops.html
DOI/Bureau of Reclamation/web	http://www.usbr.gov/main/library/
DOI/Bureau of Reclamation/web	http://www.usbr.gov/main/programs/
DOI/Bureau of Reclamation/web	http://www.usbr.gov/main/water/
DOI/Bureau of Reclamation/web	http://www.usbr.gov/mp/
DOI/Bureau of Reclamation/web	http://www.usbr.gov/pmts/hr/
DOI/Bureau of Reclamation/web	http://www.usbr.gov/pn/
DOI/Bureau of Reclamation/web	http://www.usbr.gov/uc/
DOI/Bureau of Reclamation/web	http://www.usbr.gov/uc/water/crsp/crsp_40_gc.html
Minerals Management Service	http://www.mms.gov
National Business Center	ideasec.nbc.gov
National Business Center	LewisandClark200.gov
National Business Center	www.doi.gov

National Business Center	www.doi.gov/budget
National Business Center	www.doi.gov/diversity
National Business Center	www.doi.gov/doijobs
National Business Center	www.doi.gov/foia
National Business Center	www.doi.gov/greening
National Business Center	www.doi.gov/hrm
National Business Center	www.doi.gov/iacb
National Business Center	www.doi.gov/initiatives.html
National Business Center	www.doi.gov/news
National Business Center	www.doi.gov/ocio
National Business Center	www.doi.gov/oepc
National Business Center	www.doi.gov/oia
National Business Center	www.doi.gov/ost
National Business Center	www.doi.gov/pam
National Business Center	www.doi.gov/pfm
National Business Center	www.doi.gov/training
National Business Center	www.nbc.gov
National Business Center	www.takepride.gov
National Park Service	htp://www.nps.gov/parks.html
National Park Service	http://maps2.itc.nps.gov/nps.parkatlas/jsp/locator.jsp
National Park Service	http://maps2.itc.nps.gov/nps/parkatlas/jsp/atlas.jsp
National Park Service	http://www.aoc.nps.gov
National Park Service	http://www.nfc.nps.gov
National Park Service	http://www.nps.gov
National Park Service	http://www.nps.gov/grca
National Park	http://www.nps.gov/learn

Service	
National Park Service	http://www.nps.gov/searchhtm
National Park Service	http://www.nps.gov/uspp
National Park Service	http://www.nps.gov/yell/mammothcam.htm
National Park Service	http://www.nps.gov/yell/oldfaithfulcam.htm
National Park Service	http://www.nps.gov/yose
National Park Service	www.Denver NatureNet.nps.gov
National Park Service	www.nature.nps.gov
Office of Surface Mining/OSMRE	http://www.osmre.gov/
Office of Surface Mining/OSMRE	http://www.osmre.gov/amlextension/index.htm
Office of Surface Mining/OSMRE	http://www.osmre.gov/amoint.htm
Office of Surface Mining/OSMRE	http://www.osmre.gov/index2.htm
Office of Surface Mining/OSMRE	http://www.osmre.gov/jobs.htm
Office of Surface Mining/OSMRE	http://www.osmre.gov/learn.htm
Office of Surface Mining/OSMRE	http://www.osmre.gov/links.htm
Office of Surface Mining/OSMRE	http://www.osmre.gov/mapinfo.htm
Office of Surface Mining/OSMRE	http://www.osmre.gov/mtindex.htm
Office of Surface Mining/OSMRE	http://www.osmre.gov/oc1.htm
Office of Surface Mining/OSMRE	http://www.osmre.gov/ocpress.htm
Office of Surface Mining/OSMRE	http://www.osmre.gov/order1.htm
Office of Surface Mining/OSMRE	http://www.osmre.gov/osmaml.htm
Office of Surface Mining/OSMRE	http://www.osmre.gov/phone.htm
Office of Surface Mining/OSMRE	http://www.osmre.gov/regindex.htm
Office of Surface Mining/OSMRE	http://www.osmre.gov/search.htm
Office of Surface Mining/OSMRE	http://www.osmre.gov/sitemap.htm
Office of Surface Mining/OSMRE	http://www.osmre.gov/smcra.htm

Office of Surface Mining/OSMRE	http://www.osmre.gov/statist1.htm
Office of Surface Mining/OSMRE	http://www.somre.gov/ocnews.htm
US Geological Survey	htp://edc.usgs.gov
US Geological Survey	htp://lpdaac.usgs.gov
US Geological Survey	http://earthexplorer.usgs.gov
US Geological Survey	http://earthexplorer.usgs.gov
US Geological Survey	http://gisdata.usgs.net
US Geological Survey	http://gisdata.usgs.net/website/Urban_Areas/
US Geological Survey	http://neic.usgs.gov/
US Geological Survey	http://neic.usgs.gov/neis/bulletin
US Geological Survey	http://www.earthquake.usgs.gov/recenteqs/
US Geological Survey	http://www.energy.usgs.gov
US Geological Survey	http://www.geography.usgs.gov/index.html
US Geological Survey	http://www.landsat7.usgs.gov
US Geological Survey	http://www.seamless.usgs.gov
US Geological Survey	http://www.search.usgs.gov
US Geological Survey	http://www.usgs.gov/
US Geological Survey	http://www.usgs.gov/education/
US Geological Survey	http://www.waterdata.usgs.gov/nwis/dv/
US Geological Survey	http://www.waterdata.usgs.gov/wa/nwis/ug/
US Geological Survey	http://www.waterdata.usgs.gov/wa/nwis/uv